From: **GAINER Tom** 

(206)553-0124 (fax)

Chip Humphrey/R10/USEPA/US@EPA To:

Subject: RE: ARCO Source Control Date: 10/10/2006 05:13 PM

How about you, Chip? ----Original Message-------Original Message---From: Koch.Kristine@epamail.epa.gov
[mailto:Koch.Kristine@epamail.epa.gov]
Sent: Friday, October 06, 2006 10:37 AM
To: GAINER Tom
Cc: Humphrey.Chip@epamail.epa.gov; Blischke.Eric@epamail.epa.gov;
ANDERSON Jim M
Subject: RE: ARCO Source Control I'm currently available any of those dates. Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup
1200 Sixth Avenue, M/S ECL-115
Seattle, WA 98101
(206)553-6705

> GAINER Tom <GAINER.Tom@deq. state.or.us>

10/05/2006 02:07

Kristine Koch/R10/USEPA/US@EPA, Eric Blischke/R10/USEPA/US@EPA, Chip Humphrey/R10/USEPA/US@EPA

ANDERSON Jim M

<Jim.M.Anderson@state.or.us> Subject RE: ARCO Source Control

Kristine, Chip, and Eric: Please let me know your availability to attend the Arco Source Control roll-out meeting described below on the following dates (assume 2+ hours): -12/7

-12/12 PM

I'd appreciate a quick response so we can all schedule this event.

Thanks-

--Original Message-From: ANDERSON Jim M [mailto:Jim.M.Anderson@state.or.us]
Sent: Tuesday, October 03, 2006 2:38 PM
To: koch.kristine@epa.gov; Blischke.Eric@epamail.epa.gov;
Humphrey.Chip@epamail.epa.gov
Cc: GAINER Tom; LARSEN Henning
Subject: ARCO Source Control

The purpose of this e-mail is to update you on some recent actions at the ARCO site, seek your agreement on a general path forward, & seek your participation in future project actions.

Background DEQ, EPA, & ARCO met 5/4/06. In that meeting, ARCO presented an overview of the site, operations, & previously completed source control measures. ARCO said that the existing concrete seawall/revetment (which was installed years ago for geotech/stability reasons, not source control) is failing; needs to be removed; & a new seawall needs to be constructed. ARCO advised that a sheet pile wall needs to be installed along their entire shoreline for slope stability. ARCO also proposed to do a riverward sediment removal during the demolition of the seawall/revetment, if the extent of contaminated sediment was limited to the beach & near shore area (i.e., sediment contamination did not extend very far into the river). ARCO proposed to do an in-water, sediment investigation in summer '06 to determine the extent of contamination. DEQ & ARCO both understood that EPA was, at least initially, willing to let ARCO do the proposed work (demolition, limited sediment removal, & construction of a new seawall) under DEQ oversight with support Background

from EPA..., with the understanding that sediment removal would be restricted to the near-shore area.

9/28/06 DEQ/ARCO Meeting
ARCO summarized the results of their summer '06 sediment investigation &, using a cleanup target of 340 mg/kg TPH-D, concluded that sediment contamination did not extent very far from the shore. ARCO advised us that they believed the sediment removal could be completed by removing 2/3 of the sediment from the beach & 1/3 of the sediment from the river near the shore during seasonal low water. ARCO expects to submit a Basis for Design Report to DEQ in late-11/06. ARCO expects to secure the necessary permits & contractors to do the sheet pile wall installation, revetment demolition, & sediment removal in summer '07.

Input from EPA 1) We'll schedule DEQ's ARCO PM, Tom Gainer, to attend the 10/12 meeting with Kristine, Matt, & I. Tom can give a more in-depth explanation of the site, source control, sediment investigation, & ARCO's new proposal.

- 2) We want to verify that EPA is still willing to allow ARCO's proposed work to proceed under DEQ oversight. We'll want to share the results of the sediment investigation & ARCO's proposal for sediment removal with you before you make your final decision.
- 3) Engage Kristine as EPA's lead supporting DEQ's likely oversight of ARCO's work. Kristine would coordinate with Chip & Eric so that they can integrate ARCO's source control work with the in-water RI/FS. In addition to EPA's support from the source control perspective, we request EPA input on the compatibility of this sediment removal project with the anticipated final in-water remedy. In other words, we want Chip & Eric to weigh-in on whether ARCO's yet to be proposed sediment removal action levels can reasonably be expected to achieve final clean-up levels for the RI/FS.

Action Items 1) DEQ will schedule a meeting between ARCO/DEQ/EPA for ARCO to roll-out the results of their sediment investigation & source control proposal in early-12/06.

2) EPA should respond with any initial comments to this approach & confirm your willingness to attend a 12/06 project roll-out meeting.

James M. Anderson DEQ Northwest Region Portland Harbor Section Phone (503) 229-6825 Fax (503) 229-6899